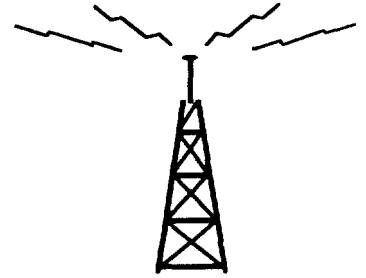




National Public Safety Telecommunications Council

NLECTC-RM
2050 E. Iliff Avenue
Denver, CO 80208
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April 24, 1998



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Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

RE: WT Docket 96-86

Dear Ms. Salas:

On April 10, 1997, the National Public Safety Telecommunications Council ("NPSTC") filed an amended channel plan (Appendix A) to the comments it originally filed on December 24, 1997, in the above-referenced proceeding. One page of that amendment discussing the important question of adjacent channel protection was inadvertently omitted and is hereby being added to the amendment. The remainder of this letter summarizes our reasoning for recommending the major changes contained in our April 10th letter.

First, we propose that the Commission adopt the Adjacent Channel Coupled Power (ACCP) method of determining interference as proposed by Motorola in their Comments and endorsed by Ericsson in their Reply Comments to this Docket instead of the 90.210(d) emission mask originally proposed by NPSTC. The ACCP method provides superior protection (see comparison slide attached to this letters) and is more readily suited to the TIA TSB-88 methodology for determining potential interference to co/adjacent channel users.

Second, we propose the same amount of spectrum (9.00 MHz) be assigned for high speed data (HSD), except that it be assigned as 36 channels at 125 kHz each; 30 channels will be for operational use, 4 for data interoperability, and 2 for video interoperability. Anticipating HSD in metropolitan areas to be a cellular-type implementation, we based this channeling on a typical cellular reuse pattern of seven. Twenty-eight (28) such channels thus provides four simultaneous channels in any area ($4 \times 7 = 28$). After taking out the recommended interoperability channels (two for video and four for data), the remaining two channels provide an option in a cellular pattern to reduce interference by frequency substitution on a case-by-case basis should a particular interference path be present (for example, across water).

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Third, we propose renaming the undesignated band between narrow channels and wide channels as "Expansion" rather than "Reserve."

Fourth, we propose that the Commission adopt 6.25 kHz channel blocks in the voice/slow speed data subband, but without reference to 6.25 kHz channels in the proposed rules, since the manufacturing community has indicated that 6.25 kHz bandwidth equipment will probably not be available in this band for many years. This plan, coupled with the simple channeling formulas proposed in the slides filed with our original amendment, allow aggregation to 25 kHz or eventual disaggregation to 6.25 KHz without the channel overlap problems we now see with refarming in the lower bands. Using these formulas, the coordinators will determine the center frequency for licensing based upon a channel number and occupied bandwidth. Likewise, the synthesizers in modern equipment will use this same information to calculate the center of the channel for the synthesizer. Assumptions/rules required for this plan to be implemented are listed, along with some sample calculations.

Last, the interoperability, vehicular repeater and state/region voice and slow-speed data channels were reorganized to allow easier and less costly implementation and reduce interference potential between similar uses at the same site.

Please contact me at (407) 246-2446 or John Powell at (510) 642-4832, should the Commission have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marilyn Ward".

Marilyn Ward
Interim Chair

cc: John Clark, Esq.
Kathryn Hosford

90.210(d) Emission Mask vs ACCP

